Navy Rcvd via email 10/26/07

October 25, 2007

James Colter
Remedial Project Manager (Code OPNEEV)
Facilities Engineering Command, Mid-Atlantic
Naval Facilities Engineering Command
9742 Maryland Avenue
Norfolk, VA 23511-3095

RE: Stone Revetment Replacement Design 30 % Submission, Old Fire Fighter Training Area, Naval Station Newport, Newport, Rhode Island

Dear Mr. Colter,

The Rhode Island Department of Environmental Management, Office of Waste Management has reviewed the Stone Revetment Replacement Design 30 % Submission; Old Fire Fighter Training Area dated September 27, 2007. Attached are comments generated as a result of this review.

The design document proposes installing a Portadam system to facilitate the installation of the stone revetment. It appears that extending the area of excavation at certain locations will allow for the removal of contaminated sediments under dry conditions thus avoiding the need for future removal actions and greatly reducing the time and the cost of the project. The Office of Waste Management recommends that the Navy take advantage of this opportunity, as it will avoid the need for additional investigations and feasibility studies under the CERCLA process and allow this portion of the site to come into compliance with regulations.

If the Navy has any questions concerning the above, please contact this Office at 401-222-2797, ext. 7111.

Sincerely,

Paul Kulpa
Office of Waste Management

cc: Matthew DeStefano, DEM OWM
Richard Gottlieb, DEM OWM
Terry Walsh, DEM OWR
Ken Anderson, RI CRMC
Kymberlee Keckler, EPA Region I
Cornelia Mueller, NSN

Comments on
Stone Revetment Replacement Design 30 % Submission
Old Fire Fighter Training Area

1. **Section 2.5, Permit Conditions**
   Page 2-13, 2nd Paragraph, last sentence

   Please change RIDEN to RIDEM.

2. **Section 3.2.2 Excavation Requirements**
   Page 3-4

   The proposal calls for the installation of a stone revetment along an area of contaminated shoreline and embankment. Installation of the revetment in this area will not allow for subsequent remedial actions. Therefore, all soils above the Rhode Island Site Remediation Residential Direct Exposure Standards and contaminated sediments at and in the vicinity of the revetment must be removed prior to the installation of the revetment. In regards to the soils/sediments in the vicinity of the revetment the extent of the soils/sediments to be removed must be of sufficient width and depth, such that any subsequent removal action can occur without compromising the revetment and/or require the installation of sheet piling or other techniques to protect the revetment.

3. **Section 3.2.3, Shoreline Stabilization Riprap Placement**
   Page 3-4

   The design notes that a geotextile will be placed beneath the revetment. As the report is a public document please include a statement describing the function of the geotextile.

4. **Section 3.2.3, Shoreline Stabilization Riprap Placement**
   Page 3-4

   The square footage of the geotextile proposed for the site appears to exceed the square footage needed to be placed under the revetment. Please recheck the calculations.

5. **Section 3.2.4 Coastal Beach Restoration**
   Page 3-6, Paragraph 3

   "The western portion is additionally protected by a concrete jersey barrier with rip rap placed on both sides."

   Please be advised that the jersey barriers were installed to address possible contaminated soil migration when soil was staged in this area during the recent removal action associated with the mounds on the site. Initially they were to be removed once this phase of the remedial action was completed, however they were left in place as they could serve a

similar role when the rest of the site was to be excavated. Therefore, please remove the above statement from the document.

6. **Section 3.2.4 Coastal Beach Restoration**
Page 3-6

This section of the document and Figure C-1 states that the coastal beach does not extend along the full length of the site (it terminates at a point along the western end of the site). A review of aerial photographs reveals that the beach extends to a point located west of that shown in Figure C-1. This discrepancy may be due to the fact that the original revetment has been compromised and has fallen onto the beach. Please revise the figure to depict the coastal beach extending west of that delineated.

7. **Section 3.2.6, Dewatering Requirements**
Page 3-6

This section of the report notes that sediment filters will be employed during the dewatering process. As the sediments/soil in this area is contaminated please include a statement concerning the effectiveness of the proposed filtering system.

8. **Section 3.3, Sequence of Construction**
Page 3-9

The work plan notes that a Portadam will be installed during the installation of the stone revetment. A review of the proposed limits of excavation identified in the 30% Design report and the extent of sediment contamination exceeding PRGs identified in the Feasibility Study reveals that extending the excavation at certain locations, beyond that outlined in the 30% Design Report, but still within the working limits of the Portadam system will allow for the removal of the contaminated sediments exceeding PRGs. Specifically, along the central portion of the site it appears that the excavation will have to be extended approximately ten feet to the south, except for two isolated areas where the excavation will need to be extended further, along the eastern end of the site it does not appear that the excavation will have to be extended. Addressing the contaminated sediments now will avoid the need to install a haul road as identified in the Feasibility Study, and allow for the removal of contaminated sediments under dry conditions. This will greatly reduced both the time and cost of the removal action and allow for this portion of the site to be addressed. Please revise the work plan to include removal of these sediments.

9. **Section 3.3, Sequence of Construction**
Page 3-9

The proposed excavation to install the revetment will extend into the water table. Contaminated groundwater, including free product exist at the site. It is recommended that the Navy employ crush stone in the backfill in the water table and the smear zone along with PVC stand pipes. This will allow for, if needed, removal of contaminated

groundwater and/or injection of oxygen or oxidants to avoid contamination of the revetment and the newly installed clean beach sand.

10. Figure C-3

A solid line is used in this figure to depict the existing grade and the final grade. This does not allow one to distinguish between the two and ascertain whether regulatory requirements are being met.

11. Figure C-3

The toe trench of the revetment extends into the beach area. At McAllister Point Landfill a gravity wall was installed which did not extend into the beach area. Please explain why the toe trench of the OFFTA revetment extends into the beach area, while the gravity wall for McAllister did not.

12. Figure C-3

As currently designed in a number of the cross sections the toe trench is not covered with two feet of beach material over its entire length. Assuming that the toe trench is employed at the site, please be advised that all portions of the toe trench must be covered with a minimum of two feet of beach material.

Parker, Stephen

From: Colter, James L CIV NAVFAC MIDLANT [james.colter@navy.mil]

Sent: Monday, October 29, 2007 5:43 PM

To: Parker, Stephen

Subject: FW: Old Fire Fighter Training Area Stone Revetment Replacement Design 30 % Submission, Comments October 25, 2007

Attachments: email.doc

Comments from RIDEM Look at Comments 8 and 9 for potential applicability.

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From: Paul Kulpa [mailto:paul.kulpa@DEM.RI.GOV]

Sent: Friday, October 26, 2007 11:38

To: Terry Walsh, Paul Kulpa, ken anderson; Mueller, Cornelia A CIV NAVFAC MIDLANT; Colter, James L CIV NAVFAC MIDLANT, Kymberlee Keckler (E-mail)

Subject: Old Fire Fighter Training Area Stone Revetment Replacement Design 30 % Submission, Comments October 25, 2007

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